

1 MS. MERRILL: -- transcribe.

2 BY MR. TONGE:

3 Q Do you know which -- what percentage each
4 person owns or...

5 A Shilpa owns 30 percent. I own -- back in
6 2013 I had owned 30 percent.

7 Q Okay.

8 A And then my mom and dad owned 20 each
9 back then.

10 Q Okay. And what was your job title at the
11 hotel?

12 A Manager, day-to-day manager.

13 Q Okay. Did you live at the hotel or...

14 A In 2013, no.

15 Q Okay. Did you at any time?

16 A Yes.

17 Q When was that?

18 A From 2007 -- or no. 2009 till 2011 or
19 maybe '12, early '12.

20 Q Okay. And what was your -- describe your
21 day to day and your responsibilities as manager for
22 the hotel.

23 A Basically finance, ordering supplies,
24 employees, hiring/firing --

25 Q Uh-huh (affirmative).

1 A -- day-to-day operations, checking rooms,
2 you know, make sure everything is perfect.

3 Q Okay. So would you do -- would you work
4 the front desk at times or work in the front office as
5 well or --

6 A Front desk was not the job title, but if
7 somebody had called out sick or -- I may have filled
8 in, but that was not the -- part of the job.

9 Q Okay.

10 A Not every day front desk.

11 Q Okay.

12 A But if somebody wanted -- got sick or
13 wanted to leave early, then I would help out.

14 (Thereupon, marked for identification,
15 Plaintiffs' [Exhibit 1](#).)

16 BY MR. TONGE:

17 Q Right, okay. I'm going to show you
18 what's marked as [Exhibit 1](#), Plaintiffs' Exhibit 1, if
19 I can get the sticker off. There we go.

20 A Okay.

21 Q And just give that a look.

22 MS. MERRILL: Thank you.

23 MR. TONGE: I have another if y'all want
24 that (indicating).

25 BY MR. TONGE:

1 Q Uh-huh (affirmative) .

2 A -- day to day, so...

3 Q What have you done to prepare for today's
4 deposition?

5 A I tried to see what I could find out
6 about the 2013 old e-mails or old paperwork that I
7 could come up with.

8 Q Okay. And did you have any old e-mails
9 or paperwork?

10 A Nothing, yeah.

11 Q Okay.

12 A Our records only go back, I think, seven
13 years.

14 Q Okay.

15 A And I think this came early this year or
16 end of last year maybe, I think, or...

17 Q It was in '23 when the case got filed --

18 A So (overspeak) .

19 Q -- yeah.

20 And just so I understand, so you didn't
21 know anything about the plaintiffs' allegations in
22 this case until you received this lawsuit?

23 A Correct.

24 Q Is that correct?

25 A Correct.

1 Q Okay. Who did you speak to to prepare
2 for the deposition today?

3 A Was it Kori or --

4 MS. WAGNER: Uh-huh (affirmative).

5 A Kori.

6 BY MR. TONGE:

7 Q Uh-huh (affirmative). Did you meet with
8 anybody else who worked at the hotel?

9 A No.

10 Q Okay. And you talked about looking for
11 documents. Did you review in this case -- here, I'll
12 just go ahead and give you this too.

13 MR. TONGE: I'll mark this as Plaintiffs'
14 [Exhibit 2](#). There you go.

15 MS. MERRILL: Thanks.

16 (Thereupon, marked for identification,
17 Plaintiffs' [Exhibit 2](#).)

18 BY MR. TONGE:

19 Q And so in this case, other than some
20 insurance policies which we have, this is the only
21 document that we've received in this case. Is
22 there -- are there any other documents beyond -- and
23 can you just identify what this document is for me?

24 A This is the building layout.

25 Q Okay. And so the 100s would be the first, 15

1 floor and the 200s the second floor?

2 A Correct.

3 Q So did you review any document other than
4 this document?

5 A Other than --

6 MS. MERRILL: Other than --

7 BY MR. TONGE:

8 Q -- for this deposition?

9 A There was nothing available --

10 Q Okay.

11 A -- from that time.

12 Q Okay. Okay. We can set that aside.

13 That was all --

14 A Okay.

15 Q -- I was asking there.

16 When did -- when was MASP created?

17 A 2007.

18 Q Okay. And when did it purchase the
19 hotel?

20 A That time.

21 Q Okay. Does it still own the hotel?

22 A It does.

23 Q Okay. Does MASP own any other hotels?

24 A No, sir.

25 Q Okay. Has it ever owned any other

1 hotels?

2 A No, sir.

3 Q Okay. And has MASP been the company that
4 operated the hotel the entire time it's owned it?

5 A Correct.

6 Q Okay. There was never any management
7 company or outside --

8 A No, sir.

9 Q Okay. Let's go to -- let's see. Oh, I'm
10 already at my last exhibit. This will be Plaintiffs'
11 [Exhibit 3](#).

12 MS. MERRILL: Thanks.

13 (Thereupon, marked for identification,
14 Plaintiffs' [Exhibit 3](#).)

15 BY MR. TONGE:

16 Q Have you seen this document before?

17 A Yes, sir.

18 Q Okay. And these are the interrogatories
19 that the plaintiffs asked -- asked the company
20 questions and you guys responded. And so in this, if
21 you go to page 2, like your responses are the bold
22 type --

23 A Uh-huh (affirmative).

24 Q -- and the questions are the not-bold
25 type.

1 A Okay.

2 Q If you go to Number 11, which will be
3 page 8 --

4 A Okay.

5 Q -- and so this question asked for the
6 identity of the people who were employed at the hotel
7 and their contact information. And then if you --
8 after some objections, if you flip to the next page,
9 you responded that (as read): Defendant MASP is no
10 longer in possession, custody or control of documents
11 related to its employees or subcontractors from 2008
12 through 2013. In further response, Defendant MASP
13 recalls that Nikki Robinson worked at the hotel for a
14 period of time as the front desk clerk but cannot
15 recall whether it was during the requested time frame.

16 Did I read that right?

17 A Correct.

18 Q Okay. And so just to deal with Nikki
19 Robinson, so do you have -- you have no idea what time
20 period she worked at the hotel?

21 A I know it was early. Like 2000 when we
22 bought the hotel, she was there and then she had left
23 and came back for a while, but...

24 Q So do you know as you sit here today if
25 she worked there in 2013?

1 A I'm not sure.

2 Q Okay. And so up here on the first line
3 on page 9 it says (as read): Upon information and
4 belief, Defendant MASP, M-A-S-P, is no longer in
5 possession, custody or control of documents.

6 Do you know why you put, why you answered
7 that "on information and belief"? Was there a reason
8 for that or...

9 A Well, we keep everything for seven years,
10 so all the documents, the employee files; and then
11 they're no longer there.

12 Q Uh-huh (affirmative). And so --

13 A So if they were still there from 2013,
14 then we would keep them, their file.

15 Q Okay. And so what I'm asking, I guess,
16 is: This information that you provided here about not
17 having documents or about Nikki Robinson, that's not a
18 guess; right?

19 A Correct.

20 Q This is --

21 A Correct.

22 Q This is true? This is true to the best
23 of your ability?

24 A Correct.

25 Q Okay. And so this, this question, also 19

1 asked for not just documents but information, and so
2 you do not have any information about -- you don't
3 have employee names or contact information --

4 A Correct.

5 Q -- or anything from that time period?

6 A Correct.

7 Q Okay. And so beyond this answer you
8 don't know the identity of any employees that worked
9 at the hotel in 2013?

10 A Correct.

11 Q Okay. And so there's not any other
12 information that you could provide about them; right?

13 A Correct.

14 Q Okay. We've covered Nikki Robinson. And
15 so I just want to make sure that, you know, we have
16 any evidence from the hotel related to our clients'
17 allegations. Okay?

18 A Okay.

19 Q So let's go to Response Number 5, so back
20 up a little bit in that exhibit. I mean, you've
21 already actually said this, but in Number 5 you state
22 that you didn't become aware of this incident until
23 you received the lawsuit in this case?

24 A Correct.

25 Q That's correct?

1 And so you don't have any documents or
2 records of any kind regarding the plaintiffs being
3 trafficked for sex at the hotel?

4 A Correct.

5 Q And the hotel doesn't have any written or
6 verbal statements from any witnesses about the
7 plaintiffs being trafficked at the hotel?

8 A Correct.

9 Q And other than Nikki Robinson, who we're
10 not sure of her time periods, the hotel doesn't know
11 the name or contact information of any --

12 A Correct.

13 Q -- any employees at the hotel?

14 A Correct.

15 MS. MERRILL: For 2013?

16 MR. TONGE: For 2013, yes, yes.

17 A '13, yeah, yeah. From the last three
18 years.

19 BY MR. TONGE:

20 Q Thank you. Yeah, yeah.

21 A Yeah.

22 Q Let's stick to 2013.

23 A '13, yeah.

24 Q Yeah, yeah, yeah. Thank you.

25 And you personally -- I know this is your

1 30(b)(6) and just speaking for the company, and maybe
2 we could shut this down and do a personal unless y'all
3 object, but do you personally have any other
4 information about employees, witnesses or any
5 information about plaintiffs' allegations that the
6 hotel does not have?

7 A No, sir.

8 Q Okay. So your personal knowledge --

9 A The same as personal knowledge.

10 Q -- is the same as what you've testified
11 to today?

12 A Correct, correct.

13 Q Okay. And so the hotel just doesn't have
14 any information or evidence about the plaintiffs'
15 allegations at all?

16 A Correct.

17 MR. TONGE: Okay. I think that's all
18 I've got.

19 MS. MERRILL: Okay. I don't have any
20 follow-up.

21 THE VIDEOGRAPHER: Going off the record
22 at 10:17.

23 [VIDEO OFF]

24 MS. MERRILL: And we'll read and sign.

25 MR. TONGE: And I'll take the transcript 22